

Exhibit N



Deposition of:
Dr. Paul McHugh

September 8, 2021

In the Matter of:
Kadel, et al vs. Folwell

Veritext Legal Solutions
800-734-5292 | calendar-dmv@veritext.com |

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF NORTH CAROLINA

* * * * *

MAXWELL KADEL, et. al., *
Plaintiffs * Case No.:
vs. * 1:19-CV-00272-LCB-LPA
DALE FOLWELL, et.al., *
Defendants *

* * * * *

Remote videotaped deposition of PAUL
McHUGH, M.D., was taken on Wednesday, September 8,
2021, commencing at 9:40 a.m., before Allison L.
Shearer, RPR, a Notary Public.

Reported By: Allison L. Shearer, RPR

1 APPEARANCES:

2
3 On behalf of the Plaintiff:

4 LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC.

5 Omar Gonzalez-Pagan, Esquire

6 ogonzalez-pagan@lambdalegal.org

7 120 Wall Street, 19th Floor

8 New York, NY 10005

9 (212) 809-8585

10
11 MCDERMOTT, WILL, & EMERY

12 Rachel Evans, Esquire

13 levans@mwe.com

14 500 North Capitol Street NW

15 Washington, D.C. 20001

16 (202) 756 8864

17
18
19
20
21 ALSO PRESENT: Eliza Spikes, Videographer

1 APPEARANCES (Continued):

2
3 On behalf of the Defendants Dale Folwell, Dee
4 Jones, and the North Carolina State Health Plan for
5 Teachers and State Employees:

6 LAW OFFICE OF JOHN G. KNEPPER

7 John G. Knepper, Esquire

8 john@knepperllc.com

9 1720 Carey Avenue, Suite 590

10 Cheyenne, Wyoming 82001

11 (307) 632-2842

12
13 On behalf of Defendant State of North Carolina
14 Department of Public Safety:

15 NORTH CAROLINA DEPARTMENT OF JUSTICE

16 Alan McInnes, Esquire

17 amcinnes@ncdoj.gov

18 114 West Edenton Street

19 Raleigh, North Carolina 27602

20 (919) 716-6529

21

1 A. Well, I don't think so. It might have
2 been something that I thought.

3 Q. Okay. Is it a term -- is the term
4 Transgender Treatment Industries a term that is
5 commonly used and accepted within the scientific
6 community?

7 A. I don't think so. As I say, it's
8 probably just mine.

9 Q. Is the term Transgender Treatment
10 Industry a term that is commonly used and accepted
11 within the medical community?

12 A. No, I -- I don't suppose so.

13 Q. Is there a peer-reviewed article or study
14 you can point me to that utilizes the term
15 Transgender Treatment Industry?

16 A. No, I -- I couldn't do that for you. No.

17 Q. I'll be honest. I never encountered this
18 term until I saw your report and that of your
19 colleagues in this case. So...

20 A. It -- it's okay.

21 Q. So I have questions because I, myself --